

**U.S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

SECOND SUPPLEMENTAL DECLARATION OF
THOMAS SCHOENBERGER

The undersigned, Thomas Schoenberger, hereby provides this statement under the penalties of perjury.

The undersigned asserts that both Manuel Chavez, III and the undersigned are described as “Third Party Defendants” in the PACER ECF court records of the above styled lawsuit.

The undersigned was named as a defendant in a lawsuit filed in the County of Los Angeles, California. Mr. Manuel Chavez, III, Carson City, Nevada was also originally named as a defendant in said lawsuit. The allegations of that lawsuit concern a Delaware state corporation known as “SHADOWBOX STRATEGIES”, here in referred to as “the firm”.

The undersigned affirms that the aforementioned County of Los Angeles lawsuit is described in ECF document no. 229 of the above styled lawsuit known as Sweigert v. Goodman.

The undersigned is aware of an article published in THE DAILY BEAST, authored by Will Sommer, dated February 18, 2020, entitled “Right-Wing Activists Discussed Wiretapping Seth Rich’s Family, Three People in the Room Say”.

The undersigned is aware of an article published in RAW STORY by Bob Brigham, dated February 17, 2020, entitled “Fox News reporter and right-wing conspiracy theorists planned to wiretap family of slain DNC staffer Seth Rich: report”.

The undersigned affirms that both of the aforementioned articles describe events that transpired in the home of FOX NEWS correspondent Edward Butowsky, that included a meeting with Manuel Chavez, III and the undersigned in attendance. The undersigned states that he was a witness and participate to these discussions in approximately September 2017. To the best of the undersigned’s knowledge the Plaintiff had no involvement in any such discussions.

The undersigned affirms that paragraph thirty-three (33) of said County of Los Angeles lawsuit’s initial complaint, dated March 16, 2020, states, “33. Defendant Chavez has stated that he “would stop at nothing in the entire world to ruin [Plaintiff’s] life, [Plaintiff’s] family’s life, [Plaintiff’s] husband’s life, and anyone that has ever been known to [Plaintiff] ever ...”.”

Mr. Chavez was active in the discussions concerning the formation of the firm in the period of the Fall of 2017. Discussions about the firm were conducted off and on approximately August to October 2017. Mr. Chavez was a part of these discussions and the corporate formation of the firm. To the best of the undersigned’s knowledge the Plaintiff had no involvement in these discussions.

The undersigned affirms that the aforementioned County of Los Angeles lawsuit’s initial complaint, dated March 16, 2020, affixes an approximate date of October 3, 2017 to the corporate formation of the firm. To the best of the undersigned’s knowledge the Plaintiff had no involvement in the formation of the firm.

The undersigned affirms that this corporate formation event is described in paragraph thirteen (13) of the said County of Los Angeles lawsuit's initial complaint, dated March 16, 2020. To the best of the undersigned's knowledge the Plaintiff had no involvement in the corporate formation of the firm or these discussions.

The undersigned affirms these discussions involved other parties to include Ms. Beth Bogaerts. Ms. Bogaerts is the plaintiff in the aforementioned lawsuit filed in the County of Los Angeles. To the undersigned's best recollection, the Plaintiff had no involvement or communications with Ms. Beth Bogaerts.

The undersigned affirms that paragraph thirty-two (32) of said lawsuit's initial complaint, dated March 16, 2020, states, "32. On or about February 6, 2020, Defendant Chavez (a/k/a "Defango") posted several online videos in order to annoy, harass, or intimate [sic] Plaintiff for no legitimate purpose."."

The undersigned affirms that during this September 2017 time frame Robert David Steele filed the first of two federal lawsuits in the Eastern District of Virginia. During this period there were communications and e-mail messages exchanged between Manuel Chavez, III, Robert David Steele and the undersigned. To the best of the undersigned's knowledge the Plaintiff had no involvement in any such communications or e-mail message exchanges.

Signed this second day of April (4/2), 2021.

Respectfully,

/s/ Thomas Schoenberger

THOMAS SCHOENBERGER

Thomas Schoenberger
Provo, Utah

CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the second day of April (4/2), two thousand and twenty-one (2021).

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